

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

Rec'd
1/24/18

APPENDIX A

JOHN JAY CONDON,

Plaintiff

v.

RODNEY BOUFFARD, et al.,

Defendants

Civil No. 1:16-cv-00372-JAW

**DEFENDANT RODNEY BOUFFARD'S RESPONSE TO PLAINTIFF'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

1. **REQUEST:** The "Administrative Control Pod" was being created inside the Special Management Unit (SMU) of Maine State Prison (MSP) between (approximately) the dates of May 1st to November 1st, 2014. Plaintiff requests the document(s) that simply lists the names of the first 15 MSP inmate "inductees" who were either in the ACP or who were considered and later inducted into the ACP on November 1st, 2014. (If that is not clear, then simply list the names of the first 15 MSP inmates inducted into the ACP.

RESPONSE: Defendant objects to this request on the grounds of relevance. The Administrative Control Unit was first opened on December 16, 2015, two months after plaintiff was transferred out of MSP. Formal evaluation of prisoners to be placed in the ACU did not take place until November 16, 2014.

Defendant further objects to this request on the grounds that the information sought is made confidential by statute, 34-A M.R.S.A. § 1216 (confidentiality of prisoner records and information contained therein.)